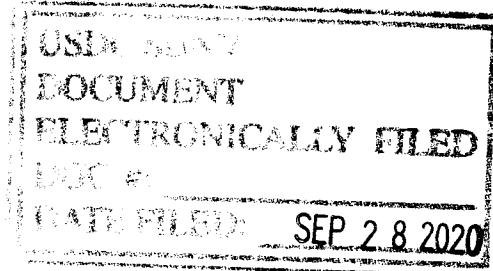


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



CARMEN GOTTLIEB,

Plaintiff

17-CV-7622 (GBD) (GWG)

- against -

EUGENE SCALIA, in his official capacity as Secretary
of Labor,

Defendants.

~~PROPOSED~~ CIVIL CASE
MANAGEMENT PLAN AND
SCHEDULE

After consultation with counsel for the parties, the following Case Management Plan is adopted. This plan is also a scheduling order pursuant to Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

1. The parties jointly request that a pretrial conference be held at a date convenient to the Court. The Court hereby schedules a conference be convened on November 10, 2020 at 10:30am.
2. No additional parties may be joined.
3. The parties will serve their Rule 26(a) Initial Disclosures on or before September 30, 2020.
4. Except for good cause shown, all fact discovery shall be commenced in time to be completed by **February 26, 2021**.
5. Except for good cause shown, all expert discovery shall be completed by **June 25, 2021**.
6. Dispositive motions are to be served by **August 18, 2021**. Answering papers are to be served within 28 days. Reply papers are to be served within fourteen (14) days. In the event a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to three (3) weeks from the decision on the motion. The final pretrial conference shall be adjourned to a date four (4) weeks from the decision on the motion.

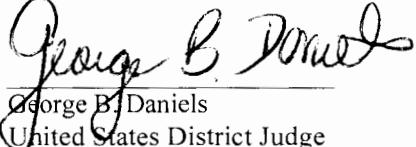
October 12, 2021 at 10:30am.

7. A final pretrial conference will be held ~~October 13, 2021 at 9:45 a.m.~~
8. The Joint Pretrial Order shall be filed no later than **October 6, 2021**. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Rules of Practice.
9. All motions and applications shall be governed by the Court's Individual Rules of Practice.
10. The parties shall be ready for trial within 48 hours notice on or after **October 18, 2021**. The estimated trial time is 3-5 days, and this is a jury trial. The parties note that this estimate of trial length is preliminary, that the estimate may change in view of discovery that occurs in the case, and that this estimate is without prejudice to any estimate that the parties may provide to the court at a future status conference or in the Joint Pretrial Order.

Dated: September ___, 2020
New York, New York

SEP 28 2020

SO ORDERED:


George B. Daniels
United States District Judge

Christopher A. Suarez
Steptoe & Johnson LLP
1330 Connecticut Ave. NW
Washington, DC 20036
202-429-8131
csuarez@steptoe.com

Attorney for Plaintiff

Tomoko Onozawa
U.S. Attorney's Office, SDNY
86 Chambers Street
New York NY
212-637-2721
tomoko.onozawa@usdoj.gov

Attorney for Defendant